

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GEORGE BOYD, et al.
*individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

LAW OFFICES OF SHAPIRO, BROWN, &
ALT, LLP, et al.,

Defendants.

Civil Action No. 3:12cv700

DECLARATION OF SHEIDA BORHANI

I, Sheida Borhani, am above the age of 18 years, am of sound mind and body, and I hereby state, under penalty of perjury, as follows:

1. I am currently employed at a bank. My typical work hours are 9-5, Monday through Friday. It would be difficult for me to get enough time off of work to travel to the Norfolk Division in order to litigate my case.

2. The property that I owned and forms the basis for this lawsuit against the Defendants is located at 609 Eanes Road, Kenbridge Virginia 23944, which is located in Lunenburg County, which is situated within the Richmond Division of the Eastern District of Virginia.

3. If this case were to be transferred to the Norfolk Division, it would cause significant hardships and inconveniences for me. Not only is the Norfolk Division three and a half hours away from my home and job, but it would be difficult for me to take enough time off of work in order to travel to the Norfolk Division, particularly given the distance and the traffic in the Hampton Roads Bridge Tunnel.

4. The Richmond Division is much closer to my home and my job. The federal courthouse in Richmond is located just under two hours away from my home. This is much more convenient for me.

5. I have two children, ages 14 and 16. Both are in school. If I had to travel to the Norfolk Division in order to litigate this case, I would likely have to find someone to watch them overnight for multiple days so that I could make the almost seven hour round trip drive to Norfolk.

6. I also intend to call several witnesses located in the Richmond Division to support



my case against the Defendants.

7. For example, I intend to seek the testimony of a Loan Processing Services representative to support my claims. LPS has an office in the Richmond Division of the Eastern District of Virginia at 5640 Cox Road, Glen Allen, Virginia 23060.

8. Additionally, many of the documents pertaining to my foreclosure are located in the Richmond Division, including the land records pertaining to my foreclosure, which are located at the Lunenburg County Circuit Court.

9. It is my preference that my case be litigated in the Richmond Division, as it is far more convenient for me.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.

Dated: 1/28/13


SHEIDA BORHANI